

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

L. ROCHELLE BANKHEAD,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON  
INDIA PRIVATE LIMITED, and AMIT  
AGARWAL, CEO of Amazon India,

Defendants.

Case No. 3:24-cv-0167-TCB

**DEFENDANTS' CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Rule 3.3 of this Court's Civil Local Rules, the undersigned counsel for Defendants Amazon.com, Inc., Amazon Data Services India Private Limited,<sup>1</sup> and Amit Agarwal (collectively, "Defendants") hereby disclose that:

(1) The undersigned counsel of record for Defendants certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

- (a) Defendant Amazon.com, Inc. has no parent corporation or publicly held corporation owning 10% or more of its stock.

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<sup>1</sup> Though Plaintiff names "Amazon India Private Limited" in the Complaint, the correct entity name is "Amazon Data Services India Private Limited." As set forth in Defendants' Motion to Dismiss filed contemporaneously herewith, Plaintiff has not established personal jurisdiction over Amazon Data Services India Private Limited.

- (b) Defendant Amazon Data Services India Private Limited's parent corporation, A100 Row, Inc., owns 10% or more of its stock.
- (c) Defendant Amit Agarwal is an individual.
- (d) Plaintiff L. Rochelle Bankhead is an individual.

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

- (a) None.

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

- (a) The undersigned, Nathan A. Huff of K&L Gates LLP, is counsel for Defendants.

(4) The undersigned further certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

- (a) Defendant Amazon.com, Inc. is a citizen of the States of Delaware and Washington.
- (b) Defendant Amazon Data Services India Private Limited is a citizen of a foreign state, to wit, the Republic of India.
- (c) Defendant Amit Agarwal is citizen of the State of California.

Dated: February 7, 2025

K&L GATES LLP

By: /s/ Nathan A. Huff

Nathan A. Huff (Bar ID No. 275532)

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*Attorneys for Defendants*

*Amazon.com, Inc., Amazon Data*

*Services India Private Limited, and Amit*

*Agarwal*

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served on this 7th day of February 2025, a copy of the foregoing Defendants' Certificate of Interested Persons and Corporate Disclosure Statement by Certified Mail upon the following:

L. Rochelle Bankhead  
65 Crescent Street  
Newnan, GA 30265  
(678) 789-8950  
l.rochellebankhead@gmail.com

*Pro Se Plaintiff*

This 7th day of February, 2025.

/s/ Nathan A. Huff  
Nathan A. Huff